

DEVIN DERHAM-BURK #104353  
CHAPTER 13 STANDING TRUSTEE  
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Trustee for Debtor(s)

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA - DIVISION 5

In re:	)	Chapter 13
	)	Case No. 25-50949 SLJ
WHITE, BRADFORD BUCKLEY	)	
	)	TRUSTEE'S FIRST AMENDED OBJECTION TO
	)	CONFIRMATION WITH CERTIFICATE OF
	)	SERVICE
	)	
	)	Confirmation Date: N/A – Trustee's Pending List
	)	
	)	Judge: Stephen L. Johnson
	)	
	)	
	)	
Debtor(s)	)	

Devin Derham-Burk, Trustee in the above matter, objects to the Confirmation of the Debtor's Plan for the following reasons:

1. The Trustee is unable to determine whether the Plan meets the liquidation test in 11 U.S.C. §1325(a)(4). The Debtor has provided the Trustee with letter from a real estate agent regarding the value of the Debtor's real property located at 3905 Whitehouse Creek Road, Davenport, California listed on Schedule A/B. Pursuant to the letter, the property is a vacant lot and "is classified as Rural/Agricultural Vacant Land." In order to verify the information provided in the paperwork, the Trustee requests the Debtor file a declaration,

1 signed under penalty of perjury, with evidence that, as of the petition date, the Debtor  
2 physically resided in/on the real property and has continued to reside there  
3

4 2. The Trustee is unable to determine if the Plan is in compliance with 11 U.S.C. §1325(a)(4).  
5 The Trustee has filed a separate objection to the debtor's claimed exemptions which must  
6 be resolved prior to the Trustee recommending confirmation.  
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8 3. In Section 5 Class 3 of the Chapter 13 Plan, Debtor is valuing a 2021 Ducati Desert Sled  
9 through the Plan. The Trustee will be unable to recommend confirmation of the plan until  
10 1) the Debtor has served the plan that purports to value collateral pursuant to §506(a), on  
11 affected lienholder in accordance with FRBP 7004, 2) the Debtor has filed a "Declaration  
12 of Compliance and No Opposition," and, 3) the Court has issued a docket entry indicating  
13 that the plan's valuation provisions can be confirmed. These requirements are set forth in  
14 the "Instructions for Valuation and Determination of Amount of Secured Claim" on  
15 Attachment B: Class 3 attached to the plan.  
16

17 4. The Debtor is not in compliance with 11 U.S.C. §342(a), §521(a)(1)(A), and Fed. R. Bankr.  
18 P. 2002, as the Debtor has failed to list a complete address for "Dovenmuehle/san Mateo"  
19 (*sp*) and "Us Bank" on Schedule E/F and the Creditor Matrix. Therefore, these creditors  
20 have not received proper notice of the bankruptcy. Since the Court was unable to notice  
21 said creditor of the filing of the bankruptcy, the Meeting of Creditors and of important  
22 filing deadlines, the Debtor must file a certificate of service indicating that both creditors  
23 were served with these documents.  
24

25 5. In order to assist the Trustee in determining whether the disposable income test in 11 U.S.C.  
26 §1325(b)(1)(B) and/or the feasibility test in 11 U.S.C. §1325(a)(6) is met, the Trustee  
27 requests that the Debtor provide her with a copy of each federal and state income tax return  
28 and W-2 form required under applicable law with respect to each tax year of the Debtor's

1 ending while the case is pending confirmation. The tax returns shall be provided to her  
2 along with a declaration signed by the Debtor stating under penalty of perjury that the  
3 returns being provided and true and correct copies of the returns that the Debtor submitted  
4 to the taxing authorities.

5  
6 Dated: September 17, 2025

/S/ Devin Derham-Burk

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Chapter 13 Trustee  
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**CERTIFICATE OF SERVICE BY MAIL**

I declare that I am over the age of 18 years, not a party to the within case; my business address is 105 Cooper Court, Los Gatos, California 95032. I served a copy of the within Trustee's First Amended Objection to Confirmation by placing same in an envelope in the U.S. Mail at Los Gatos, California on September 17, 2025.

Said envelopes were addressed as follows:

BRADFORD BUCKLEY WHITE  
PO BOX 136  
SAN GREGORIO CA 94074

LAW OFFICES OF AARON LIPTON  
7960 B SOQUEL DR #156  
APTOS CA 95003

/S/ Erica Reyes

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Office of Devin Derham-Burk, Trustee